

EXHIBIT Q

SHOOK, HARDY & BACON LLP

B. Trent Webb, Esq. (*pro hac vice*)

Eric Buresh, Esq. (*pro hac vice*)

2555 Grand Boulevard

Kansas City, Missouri 64108-2613

Telephone: (816) 474-6550

Facsimile: (816) 421-5547

bwebb@shb.com

eburesh@shb.com

Robert H. Reckers, Esq. (*pro hac vice*)

600 Travis Street, Suite 1600

Houston, Texas 77002

Telephone: (713) 227-8008

Facsimile: (731) 227-9508

rreckers@shb.com

GREENBERG TRAURIG

Mark G. Tratos, Esq. (Nevada Bar No. 1086)

Brandon Roos, Esq. (Nevada Bar No. 7888)

Leslie Godfrey, Esq. (Nevada Bar No. 10229)

3773 Howard Hughes Parkway

Suite 400 North

Las Vegas, NV 89169

Telephone: (702) 792-3773

Facsimile: (702) 792-9002

tratosm@gtlaw.com

roosb@gtlaw.com

godfrey1@gtlaw.com

LEWIS AND ROCA LLP

W. West Allen (Nevada Bar No. 5566)

3993 Howard Hughes Parkway, Suite 600

Las Vegas, Nevada 89169

Tel: (702) 949-8200

Fax: (702) 949-8398

WAllen@LRLaw.com

Attorneys for Defendants

RIMINI STREET, INC. and SETH RAVIN

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ORACLE USA, INC., a Colorado corporation;
ORACLE AMERICA, INC., a Delaware
corporation; and ORACLE INTERNATIONAL
CORPORATION, a California corporation,

Plaintiffs,

v.

RIMINI STREET, INC. , a Nevada corporation;
SETH RAVIN, an individual,

Defendants.

Case No. 2:10-cv-0106-LRH-PAL

**DEFENDANT RIMINI STREET INC.'S
RESPONSES AND OBJECTIONS TO
PLAINTIFFS' THIRD SET OF
REQUESTS FOR INSPECTION OF
DOCUMENTS AND THINGS**

Pursuant to Federal Rules of Civil Procedure 26 and 34, Rimini Street, Inc. (“Rimini Street”), by and through its undersigned counsel, responds and objects to Oracle USA, Inc., Oracle America, Inc., and Oracle International Corp.’s (“Oracle”) Third Set of Requests for Inspection of Documents and Things (“Requests”).

GENERAL OBJECTIONS

Rimini incorporates by reference its objections to Oracle’s previous sets of written discovery requests.

RESPONSES AND SPECIFIC OBJECTIONS

REQUEST NO. 3:

Rimini’s SharePoint Site, accessed for inspection via Read-Only Credentials not expiring before the Close of Expert Discovery in This Lawsuit.

RESPONSE:

Rimini Street objects to the Request in its entirety as overly broad and beyond the scope of permissible discovery. This request for unlimited and unsupervised access to Rimini’s internal network is unreasonable and unwarranted. Though the request is submitted as a “request for inspection,” in reality it seeks active log-in credentials to Rimini’s intranet and internal document management system until well past the fact discovery deadline. This is not a proper “request for inspection” under the Federal Rules. Rimini also objects to the request as unduly burdensome in that it would be impractical (if not impossible) and cost-prohibitive for Rimini to review every document and electronic location encompassed by this request for privileged materials.

Rimini Street’s SharePoint Site is the main source of information regarding its business operations. Allowing Oracle direct and ongoing access to Rimini Street’s site would result in access to massive amounts of information that is not relevant to this matter. In addition, Rimini Street’s responses to Oracle’s Requests for Production of Documents have resulted in the production of thousands of responsive documents from Rimini Street’s SharePoint Site, including native SharePoint files.

Rimini Street will continue to produce documents from SharePoint that are requested by Oracle and responsive to Oracle's document requests, but Rimini Street declines Oracle the requested provide active log-in credentials to Rimini's intranet and internal document management system. In addition, Rimini will meet-and-confer with Oracle regarding the appropriate production methods for relevant information stored on SharePoint that Oracle asserts cannot be adequately reviewed using the production methods previously agreed to by the parties.

DATED: October 31, 2011 SHOOK, HARDY & BACON

By: /s/ Robert H. Reckers
Robert H. Reckers, Esq.
Attorney for Defendants
Rimini Street, Inc. and Seth Ravin

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Response to Third Set of Requests for Inspection to Defendants was served on the 31th day of October 2011, via email, as indicated below.

BOIES, SCHILLER & FLEXNER LLP
 RICHARD J. POCKER (NV Bar No. 3568)
 300 South Fourth Street, Suite 800
 Las Vegas, NV 89101
 Telephone: (702) 382-7300
 Facsimile: (702) 382-2755
rpocker@bsflp.com

BOIES, SCHILLER & FLEXNER LLP
 STEVEN C. HOLTZMAN (*pro hac vice*)
 FRED NORTON (*pro hac vice*)
 KIERAN P. RINGGENBERG (*pro hac vice*)
 1999 Harrison Street, Suite 900
 Oakland, CA 94612
 Telephone: (510) 874-1000
 Facsimile: (510) 874-1460
sholtzman@bsflp.com
fnorton@bsflp.com
kringgenberg@bsflp.com

BINGHAM MCCUTCHEN LLP
 GEOFFREY M. HOWARD (*pro hac vice*)
 THOMAS S. HIXSON (*pro hac vice*)
 KRISTEN A. PALUMBO (*pro hac vice*)
 Three Embarcadero Center
 San Francisco, CA 94111-4067
 Telephone: 415.393.2000
 Facsimile: 415.393.2286
geoff.howard@bingham.com
thomas.hixson@bingham.com
kristen.palumbo@bingham.com

ORACLE CORPORATION
 JAMES C. MAROULIS (*pro hac vice*)
 500 Oracle Parkway
 M/S 5op7
 Redwood City, CA 94070
 Telephone: 650.506.4846
 Facsimile: 650.506.7114
dorian.daley@oracle.com
deborah.miller@oracle.com
jim.maroulis@oracle.com

By: /s/ Jeff Glidewell
 Paralegal for Robert H. Reckers, Esq.
 Attorney for Defendants
 Rimini Street, Inc. and Seth Ravin